

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 1:23-cr-1483-MLG

SERAPHINE WARREN-BEGAY,
JOSEPHINE BEKAY, and
NELTON ALEX BEKAY.

Defendants.

**JOINT UNOPPOSED MOTION TO EXTEND RULE 16 DISCOVERY MOTION
DEADLINE**

Defendant Seraphine Warren-Begay, through counsel, The Law Office of Ryan J. Villa, by Ryan J. Villa and Justine Fox-Young, joined by Josephine Bekay through counsel Marc. H. Robert and Nelson Alex Bekay through counsel Ahmad Assed, moves the Court to extend the Rule 16 Discovery Motion deadline by two (2) weeks, and as grounds for this Motion states:

1. On December 1, 2023, this Court's issued an Order Designating the Case Complex, Continuing Trial and Entering a Scheduling Order. *See* Order [Doc. 55].
2. The order set the deadline for Rule 16 discovery motions on February 19, 2024, with responses due on March 4, 2024 and replies due on March 18, 2024. *Id.*
3. Defense counsel and the United States have been working to identify discovery disputes and resolve them informally. However, the Government has indicated that it will not produce discovery concerning its recent prosecution of the alleged victim in this matter. Defendants believe this discovery is relevant and exculpatory and intend to file a motion to compel.
4. Undersigned counsel, Mr. Villa, was recently appointed to the case on January 17, 2024, and thus needs additional time to prepare and file this motion. The two-week extensions

sought for the Motion and response and reply will not interfere with any other deadline or the trial date.

5. Accordingly, counsel respectfully requests the Court extend the Rule 16 discovery motion deadline by two (2) weeks.

6. If granted, Rule 16 discovery motions would be due on March 4, 2024, with responses due on March 18, 2024 and replies due on April 1, 2024.

7. Counsel has contacted Assistant United States Attorney Matthew McGinley regarding this Motion, and he indicates that the Government does not oppose the relief requested herein.

8. Counsel has contacted counsel for co-defendants Ms. Bekay and Mr. Bekay and both counsel indicate these Defendants join in the Motion.

WHEREFORE, counsel for Defendants respectfully request this Court enter an order extending the Rule 16 discovery motion deadline to March 4, 2024 with responses to March 18, 2024 and replies to April 1, 2024.

Respectfully submitted,
The Law Office of Ryan J. Villa

/s/ Ryan J. Villa
RYAN J. VILLA
Counsel for Defendant
5501 Eagle Rock Ave NE, Suite C2
Albuquerque, New Mexico 87113
(505) 639-5709
(505) 433-5812 (fax)
ryan@rjvlawfirm.com

/s/ Justine Fox-Young
Justine Fox-Young
5501 Eagle Rock Ave NE Ste C2
Albuquerque, NM 87113
(505) 796-8268
justine@foxyounglaw.com

Attorneys for Defendant Seraphine Warren-Begay

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2024, a copy of the foregoing document was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/Ryan J. Villa
RYAN J. VILLA